FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-0006186

FACILITY NAME J.M. Huber Corporation

SUMMARY

The J. M. Huber Corporation owns and operates an inorganic pigment slurry plant in Longview, Washington. J. M. Huber's Longview Plant has been designed to prevent pollution from leaving the plant site. The facility produces pigment additives to paper producing mills in the Northwest area of the United States. These white inorganic pigment additives are either synthetic amorphous silica or sodium aluminum silicates of which both are non-hazardous.

The Huber Longview facility discharges its effluent to Weyerhaeuser Longview waste water treatment facility via forced flow from their clarified effluent tank. The effluent is a dilute solution of sodium sulfate that has a pH between 5.5 and 10.0. the suspended solids of the effluent leaving the Huber facility will be less than 500 pounds per day. Effluent will be collected in the clarified effluent tank prior to pumping to Weyerhaeuser Longview. The sanitary sewage is collected and pumped back to Weyerhaeuser where it is properly treated.

The Huber facility's solid waste will be collected in dumpsters located inside the Plant's process building area. Waste, which has been neutralized and having all its "free moisture" removed, will be taken to an approved landfill for ultimate disposal. Trash will be collected in dumpsters that will be taken to Longview Municipal Landfill.

This permit will be protective of the environment and of the Weyerhaeuser Longview wastewater treatment facility.

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. **ST-0006186.** The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to the Weyerhaeuser Longview wastewater treatment system. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to wastewater treatment systems which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A-Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix D-Response to Comments.

GENERAL INFORMATION	
Applicant	
Facility Name and Address	J. M. Huber Corporation 3400 Industrial Way Longview, Washington 98632
Type of Facility:	Synthetic amorphous Silica and Silicates
Facility Discharge Location	Discharges into the Weyerhaeuser Longview wastewater treatment system
Treatment Plant Receiving Discharge	Weyerhaeuser Longview wastewater treatment system
Contact at Facility	Name: Tom Kelley Telephone#: (360) 425-7087
Responsible Official	Name: Tom Kelley Title: Plant Manager Address: same as above Telephone #: (360) 425-7087 FAX # (360) 425-6204

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

The J.M. Huber Corporation owns and operates this facility. This facility is an inorganic pigment slurry plant. The facility is located in Longview, Washington.

HISTORY

This plant has been operating under a general permit. The corrected Waste Discharge application was submitted August 1. 2001. The Department of Ecology is now issuing a State Waste Discharge Permit for this facility. The discharge permit number will be ST-0006186.

INDUSTRIAL PROCESSES

This facility is an inorganic pigment slurry plant. Sulfuric acid, aluminum sulfate, sodium silicate and magnesium hydroxide are the caw materials and chemicals used in the processes. This facility produces pigment additives to paper producing mills. The facility produces white inorganic pigment additives that are either synthetic amorphous silica or sodium aluminum silicates.

TREATMENT PROCESSES

The plant effluent is primarily filtrate from the product filter. The pH of the effluent will vary from 5.5 to 10.0, and the total daily flow will be less than 160,000 gallons per day. The effluent dissolved solids will consist of sodium sulfate at concentrations between 5 – 10 percent. The suspended solids of the effluent will be less than 600 pounds per day, and composite sampler is used to measure daily solids. Floor drains in the process area are used to capture washings from the floor. Floor drains feed into a floor washings pit. The pit discharge pump serves to pump decanted clear liquid to the clarified effluent tank and to pump solid-laden contents to a small landfill pressure filter. Filtrate from the land fill filter goes to the clarified effluent tank. Filter cake from the landfill filter is gravity-discharged through a chute into plastic-lined boxes to be taken to the county sanitary landfill. Floor washings consist primarily of spilled product, and the pH in the floor washing pit will be manually adjusted as conditions require. The effluent from the clarified effluent tank is sent to Weyerhaeuser Longview wastewater treatment system for treatment.

PERMIT STATUS

An application for a permit was submitted to the Department on March 7, 1994.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in discharge monitoring reports. The proposed wastewater discharge is characterized for the following parameters:

Parameter	Concentration
pH	7.82 average
Flow	120,000 gallons/day monthly average

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the waste water treatment system. Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the wastewater treatment facility.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 73-216-110). The following permit limitations are necessary to satisfy the requirement for AKART:

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the Weyerhaeuser Longview wastewater treatment system from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on the permit limits established for the Weyerhaeuser Longview wastewater treatment system as required in Weyerhaeuser's permit. Applicable limits for this discharge include the following:

In order to protect Weyerhaeuser Longview wastewater treatment system from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, effluent limitations for certain parameters are necessary. These limitations are based on local limits developed by Ecology for Weyerhaeuser Longview wastewater treatment system. Applicable effluent limits for this discharge include the following:

Pollutant concentrations in the proposed discharge with technology-based controls in place will not cause problems at the receiving wastewater treatment system such as interference, pass-through or hazardous exposure to the wastewater treatment system workers nor will it result in unacceptable pollutant levels in the wastewater treatment system's sludge.

Proposed Limits
pH $5.5 \leq pH \leq 10$ at all times
Flow Average Monthly 120,000 gallons/day

Flow Maximum Daily 160,000 gallons/day

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Condition S2 and S9. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 273-216-110 and 40 CFR 403.12 (e),(g), and (h)).

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.4. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the Weyerhaeuser Longview wastewater treatment system. These include substances which cause pass-through or interference, pollutants which may cause damage to the wastewater treatment system or harm to the wastewater treatment facility's workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.

This proposed permit requires, under authority of RCW 90.48.080, that the Permittee develop and submit to the Department a solid waste plan to prevent solid waste from causing pollution of waters of the state. The plan must also be submitted to the local solid waste permitting agency for approval.

This proposed permit requires, under the authority of RCW 90.48.080, that the Permittee update the solid waste plan designed to prevent solid waste from causing pollution of the waters of the state and submit it to the Department. The plan must also be submitted to the local solid waste permitting agency for approval.

NON- ROUTINE AND UNANTICIPATED DISCHARGES

Occasionally, this facility may generate wastewater which is not characterized in their permit application because it is not a routine discharge and was not anticipated at the time of application. These typically are waters used to pressure test storage tanks or fire water systems or leaks from drinking water systems. These are typically clean waste waters but may be contaminated with pollutants. The permit contains an authorization for non-routine and unanticipated discharges. The permit requires a characterization of these waste waters for pollutants and examination of the opportunities for reuse. Depending on the nature and extent of pollutants in this wastewater and opportunities for reuse, Ecology may authorize a direct discharge via the process wastewater outfall or through a stormwater outfall for clean water, require the wastewater to be placed through the facilities wastewater treatment process or require the water to be reused.

SPILL PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a) (1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The Permittee has developed a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The proposed permit requires the Permittee to update this plan and submit it to the Department.

SLUG DISCHARGE CONTROL PLAN

The Department has determined that the Permittee has the potential for a batch discharge or a spill that could adversely effect the Weyerhaeuser Longview wastewater treatment facility, therefore a slug discharge control plan is required (40 CFR 403.8 (f)).

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to other wastewater treatment facilities permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for five years.

APPENDICES

APPENDIX A-PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

*********A Public Notice of Draft (PNOD) will be published July 10, 2002 in Longview Daily News to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for review and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at Ecology's Headquarters. Please send written comments to:

Department of Ecology
Industrial Section
P.O. Box 47706
Olympia, Washington 98504-7706

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (360) 407-6934, or by writing to the address listed above.

This permit was written by Marc Crooks.

APPENDIX B-GLOSSARY

Ambient Water Quality-The existing environmental condition of the water in a receiving water body.

Ammonia-Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation-The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD_5--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass-The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards-National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a wastewater treatment facility by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample-A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite" (collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity-Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring -Uninterrupted, unless otherwise noted in the permit.

Engineering Report-A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample-A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User-A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater-Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference- A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the wastewater treatment facility, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the wastewater treatment facility's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued there under (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits-Specific prohibitions or limits on pollutants or pollutant parameters developed by a wastewater treatment facility.

Maximum Daily Discharge Limitation-The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through- A discharge which exits the wastewater treatment facility into waters of the-State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the wastewater treatment facility's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH-The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;

b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the wastewater treatment facility (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the 1VIDL (method detection level).

Significant Industrial User (SIU)--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the wastewater treatment facility (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the wastewater treatment facility; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the wastewater treatment facility's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 401.8(f)(6)).

Slug Discharge-Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the wastewater treatment facility. This may include any pollutant released at a flow rate which may cause interference with the wastewater treatment facility. Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the wastewater treatment facility's operation or for violating any pretreatment standard or requirement, the Control

Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or wastewater treatment facility, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated wastewater treatment facility's or to the wastewater treatment facility in the case of delegated wastewater treatment facility's.

State Waters-Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater-That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit-A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria-A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids-That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS) --Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit-A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C -RESPONSE TO COMMENTS

No comments were received by the Department of Ecology during the public comment period.